

**SEALED**

## UNITED STATES DISTRICT COURT

for the

Southern District of West Virginia

United States of America

v.

JEREMIAH TAYLOR

Case No.

3:19-mj-00082

**SEALED***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan. 19, 2019 to Jan. 24, 2019 in the county of Cabell in the  
Southern District of West Virginia, the defendant(s) violated:

*Code Section**Offense Description*

18 USC 2252A(a)(2), (b)(1)

Distribution of Child Pornography

This criminal complaint is based on these facts:

See Attached.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

December 16, 2019

City and state:

Huntington, WV

*Complainant's signature*

SA Antonio Ortega

*Printed name and title*

*Judge's signature*

Cheryl A. Eifert, United States Magistrate Judge

*Printed name and title*

STATE OF WEST VIRGINIA

COUNTY OF CABELL, to-wit:

A F F I D A V I T

I, Special Agent Antonio Ortega, the Affiant, being duly sworn, do hereby depose and say as follows:

1. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am a Special Agent with the Federal Bureau of Investigation (hereinafter "FBI"), assigned to the Huntington, West Virginia, Resident Agency Office of the Pittsburgh Division. I have been employed as a Special Agent for the FBI since July 2018. I am currently tasked with investigating violations of federal law within the Southern District of West Virginia and elsewhere. As part of my duties, I have received training regarding the investigation of various federal crimes including, but not limited to, child exploitation, civil rights, and violent crimes. By virtue of my FBI employment, I perform and have performed a variety of investigative tasks, including conducting arrests and the execution of federal search warrants and seizures. As a Special Agent, I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7).

2. I have worked with federal, state, and local law enforcement officers in the Southern District of West Virginia,

and elsewhere. Based on my experience and the experience of others, I am familiar with matters including, but not limited to, the means and methods used by persons who possess, collect, receive, distribute, otherwise traffick in and access with intent to view child pornography.

3. On January 19, 2019, an FBI Online Covert Employee (hereinafter "OCE") connected to the Internet in an online undercover capacity from a computer located at the FBI Office in Salt Lake City, Utah. A software program was used to record the online activity, chats and images identified within Kik. Shortly before this date, the OCE posted numerous online bulletin messages on specific social media forums, which, based on the OCE's experience and information gathered from other sources, are websites frequented by individuals who have a sexual interest in children and incest. The OCE responded to certain messages or post messages on these public forums and provided the OCE's Kik screen name.

4. Between January 19, 2019 and January 24, 2019, an individual with the Kik profile username "58thatdude58," identified as JEREMIAH TAYLOR, messaged the OCE on Kik. The OCE determined that "58thatdude58" appeared to have sexual interests in children and incest and was a member of a child pornography group titled "No.limits.-Yo.uN.G, #ta.booo.stuf" where group members posted thousands of images and videos of child pornography.

"58thatdude58" posted links directly to the group that contained apparent child pornography.

5. "58thatdude58" conversed directly with the OCE and stated "I have no limits" and "I have videos" in reference to child pornography. "58thatdude58" then sent the OCE multiple videos depicting child rape. The videos depict toddlers and/or prepubescent minors engaged in sexual acts and being penetrated orally, vaginally and/or anally by adult male penises. "58thatdude58" also sent a video depicting a prepubescent child performing oral sex on an animal. "58thatdude58" stated that he obtained the videos from a group where the videos were traded before the group itself was deleted. Based on my training and experience, this indicates "58thatdude58" had the videos saved on the mobile device he was using to access Kik during this chat.

6. "58thatdude58" also expressed interest in wanting to produce child pornography of the OCE'S fictitious nine year-old daughter when he asked the OCE to take videos of his daughter naked and in sexual positions. When asked what sort of photos "58thatdude58" wanted of the OCE's daughter, "58thatdude58" responded "Something sexy." "58thatdude58" then specified that he wanted to see the OCE's daughter naked, with her legs in the air, her legs spread apart and her "finger inside."

7. JEREMIAH TAYLOR was identified as "58thatdude58" through Kik subscriber data and additional investigation. The Kik

subscriber data shows that the email associated with the "58thatdude58" Kik account is jeremiahtaylor447@gmail.com. Subscriber data obtained through an administrative subpoena to Google shows that the email address jeremiahtaylor447@gmail.com belongs to JEREMIAH TAYLOR.

8. The recovery email address associated with jeremiahtaylor447@gmail.com is taylor447@live.marshall.edu. Through additional investigation, investigators learned that JEREMIAH TAYLOR is a former student of Marshall University in Huntington, West Virginia, and that Marshall University email address is registered to him. JEREMIAH TAYLOR played football at Marshall University and his jersey number was 58. This jersey number corresponds to the 58 featured in the Kik username "58thatdude58."

9. Investigators learned that at the time of the chats, JEREMIAH TAYLOR was 30 years old and he was a resident of Ohio. This information matches the identifiers provided by "58thatdude58" during one of the conversations wherein he told the OCE that he was 30 years old and resided in Ohio.

10. Through the Kik subscriber data, investigators learned that "58thatdude58" accessed the Kik account during the conversations at issue using the IP address 74.195.15.79. Through investigation, investigators also learned that this IP address belongs to Suddenlink Communications, an Internet service

provider. An administrative subpoena sent to Suddenlink Communications identifies the subscriber data for the IP address as Snap Fitness, 305 E. Main St. Milton, Cabell County, West Virginia 25541.

11. Investigators located a LinkedIn profile for JEREMIAH TAYLOR. This profile bears a photograph depicting JEREMIAH TAYLOR's face and states that he is a graduate of Marshall University. It also states that JEREMIAH TAYLOR was an employee at Snap Fitness from July 2017 through July 2019, which includes the January 19, 2019 and January 24, 2019 time period of the Kik messages between "58thatdude58" and the OCE.

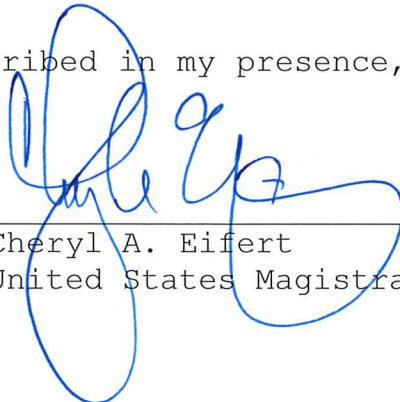
12. On or about October 4, 2019, investigators spoke with a representative of Snap Fitness in Milton, West Virginia, and that individual confirmed that a JEREMIAH TAYLOR was previously employed at Snap Fitness in early 2019 but no longer works there. On or about December 5, 2019, investigators spoke with the current manager of Snap Fitness in Milton, West Virginia, and the manager confirmed that JEREMIAH TAYLOR was previously a manager at that facility but was fired several months earlier.

13. Based upon my experience and training, the videos distributed by JEREMIAH TAYLOR constituted child pornography.

Further your affiant sayeth naught.

  
SA ANTONIO ORTEGA

Sworn to before me, and subscribed in my presence, this 16<sup>th</sup>  
day of December 2019.

  
Cheryl A. Eifert  
United States Magistrate Judge

